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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

LISA LIBERI, *et al.*

Plaintiffs,

vs.

ORLY TAITZ, *et al.*

Defendants.

) Case No. 8:11-CV-00485-AG (AJW)
) Hon. Andrew Guilford
) Courtroom 10D

) **DEFENDANT, ORLY TAITZ'S**
) **RESPONSE PURSUANT TO COURT**
) **ORDER DATED AUGUST 12, 2011**
) **RE: LITIGATION HISTORY**

) Date Action Filed: May 4, 2009
) Discovery Cut-Off: March 5, 2012
) Final Pre-Trial Conf.: May 21, 2012
) Trial Date: June 5, 2012

**TO THE COURT, ALL PARTIES, AND/OR THEIR ATTORNEYS OF
RECORD:**

This matter, as to Defendant, ORLY TAITZ, has been stayed pursuant to this Court's Order dated August 19, 2011. Despite this stay of proceedings, in an abundance of caution, and in order to keep with the spirit of the Order of this Court dated August 12, 2011, ORLY TAITZ hereby submits the following response:

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I. Cases Filed by Defendant, Orly Taitz, on Her Own Behalf, or on Behalf of Affiliated Entities

Defendant, Orly Taitz has filed seven cases on her own behalf, or on behalf of affiliated entities, in the last three years, as follows:

1. *Taitz v. Dunn*, Orange County Superior Court, Case No. 30-2010-00381664¹
2. *Taitz v. Bowen*, California Supreme Court, Case No. S184384
3. *Taitz v. Obama*, United States District Court for the District of Columbia, Case No. 1:10-CV-00151-RCL
4. *Taitz v. Astrue*, United States District Court for the District of Columbia, Case No. 1:11-CV-00402-RCL ²
5. *Taitz v. Ruemmler*, United States District Court for the District of Columbia, Case No. 1:11-CV-01421-RCL
6. *Taitz v. Fuddy*, Circuit Court for the First Circuit Honolulu, Hawaii, Case No. CIVIL 11-1-1731-08
7. *Medical Dental v. Pierson*, Orange County Superior Court, Case No. 30-2010-00367447³

Furthermore, in the spirit of full disclosure as ordered by this Court, Defendant, Orly Taitz has also sought to intervene by way of filing Motions to Intervene in two cases, as follows:

- *Hornbeck v. Salazar*, United States District Court for the Eastern District of Louisiana, Case No. 2:10-CV-01663-MLCF-JCW

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¹ Items numbered 1, 2 and 3 are each related to petitions regarding the presidential election of November of 2008.

² Items numbered 4, 5 and 6 are each related to similar Freedom of Information Act claims.

³ This matter involved a breach of lease agreement as to property owned by Ms. Taitz's dental practice.

- *State of Florida v. U.S. Department of Health and Human Services*, United States District Court for the Northern District of Louisiana, Case No. 3:10-CV-91-RV/EMT

II. Cases In Which Defendant, Orly Taitz, Has Been a Party

Defendant, Orly Taitz, has personally been a party to the 11 cases in the last three years. These cases include the nine cases listed in the previous section (numbered 1 through 9, which include the matters in which Ms. Taitz has intervened as a party), and also two cases in which Orly Taitz has been a Defendant, including the present matter (numbered 10 and 11), as follows:

1. *Taitz v. Dunn*, Orange County Superior Court, Case No. 30-2010-00381664
2. *Taitz v. Bowen*, California Supreme Court, Case No. S184384
3. *Taitz v. Obama*, United States District Court for the District of Columbia, Case No. 1:10-CV-00151-RCL
4. *Taitz v. Astrue*, United States District Court for the District of Columbia, Case No. 1:11-CV-00402-RCL
5. *Taitz v. Ruemmler*, United States District Court for the District of Columbia, Case No. 1:11-CV-01421-RCL
6. *Taitz v. Fuddy*, Circuit Court for the First Circuit Honolulu, Hawaii, Case No. CIVIL 11-1-1731-08
7. *Medical Dental v. Pierson*, Orange County Superior Court, Case No. 30-2010-00367447.
8. *Hornbeck v. Salazar*, United States District Court for the Eastern District of Louisiana, Case No. 2:10-CV-01663-MLCF-JCW (as an Intervenor)
9. *State of Florida v. U.S. Department of Health and Human Services*, United States District Court for the Northern District of Louisiana, Case No. 3:10-CV-91-RV/EMT (as an Intervenor)

10. *Lincoln v. Daylight Chemical Information Systems, Inc.*, United States District Court for the Central District of California, Case No. 8:10-CV-15730-AG

11. *Liberi v. Taitz*, United States District Court for the Central District of California, Case No. 8:11-CV-00485-AG, originally filed in the United States District Court for the Eastern District of Pennsylvania, Case No. 2:9-CV-01898-ER. This matter has involved four appeals as follows: two appeals in the Third Circuit Court of Appeals entitled *Liberi v. Taitz*, Case Nos. 09-3403 and 10-3000; and two appeals in the Ninth Circuit Court of Appeals also entitled *Liberi v. Taitz*, Case Nos. 11-56079 and 11-56164.⁴

III. Sanctions as to Defendant, Orly Taitz

Finally, as requested by this Court, Orly Taitz has been sanctioned as follows:

1. *Rhodes v. MacDonald*, United States District Court for the Middle District of Georgia, Case No. 4:09-CV-106, in the amount of \$20,000. This sanction has been appealed to the Eleventh Circuit Court of Appeals and the United States Supreme Court, and is currently being reviewed by the United Nations Commission for Civil Rights Defenders.

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⁴ Note that both the *Lincoln v. Daylight Chem.* and *Liberi v. Taitz* cases, the only cases in which Ms. Taitz is a defendant, involved the same attorneys representing the plaintiffs (Philip J. Berg and Gary Kreep).

2. *Liberi v. Taitz*, United States District Court for the Central
District of California, Case No. 8:11-CV-00485-AG in the
amount of \$250.

DATED: September 2, 2011 **SCHUMANN, RALLO & ROSENBERG, LLP**

By: /s/ PETER COOK, ESQ.

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